

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
W. R. GRACE & CO., <u>et al.</u> , ¹)	Case No. 01-1139 (JKF)
)	Jointly Administered
Debtors.)	

**DEBTORS' MOTION FOR LEAVE FROM THIS COURT'S
JANUARY 18, 2006 SCHEDULING ORDER AND TO SHORTEN
NOTICE PERIOD OF MOTION FOR ENTRY OF AN ORDER AUTHORIZING
DEBTORS TO FILE UNDER SEAL W.R. GRACE & CO.'S OPPOSITION TO MOTION
OF THE OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY
CLAIMANTS TO COMPEL PRODUCTION OF DOCUMENTS**

The above-captioned debtors and debtors in possession (collectively, the "Debtors") hereby move this Court (the "Motion to Shorten"), pursuant to Del. Bankr. LR 9006-1(e), Rule 9006(c) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and section 102 of title 11 of the United States Code (as amended, the "Bankruptcy Code"), for an Order shortening the notice period with respect to the Motion for the entry of an order authorizing the

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

Debtors to file under seal W.R. Grace & Co.'s Opposition to Motion of the Official Committee of Asbestos Personal Injury Claimants to Compel Production of Documents (the "Seal Motion") and for leave from this Court's *Amended Order Scheduling Omnibus Hearing Dates for 2006* [Docket 11562] (the "Scheduling Order"), dated January 18, 2006, so that the Seal Motion may be heard at the December 5, 2006 hearing on the Motion of the Official Committee of Asbestos Personal Injury Claimants to Compel Production of Documents (the "ACC's Motion to Compel").

Bankruptcy Rule 9006(c) provides that when an act is required to be done within a specified time by the Bankruptcy Rules "the court for cause shown may in its discretion with or without motion or notice order the period reduced." Similarly, Del.Bankr.LR 9006-1(e) provides in pertinent part that "no motion will be scheduled on less notice than required by these Rules or the Fed. R. Bankr. P. except by Order of the Court, on written motion . . . specifying the exigencies justifying shortened notice."

Accordingly, the Debtors file this motion seeking an Order of this Court for leave of the Scheduling Order and shortening the notice period prescribed by Del. Bankr. LR 9006-1(c) to enable the Debtors to have the Seal Motion heard at same time as the ACC Motion to Compel. The Debtors also respectfully request that the Court establish November 30, 2006 at 12:00 p.m. as the deadline to object to the Seal Motion.

The ACC and the Futures Claim Representative have also filed seal motions with respect to the ACC's Motion to Compel which are scheduled for hearing on December 5, 2006.

Given the nature of the relief requested, the Debtors respectfully submit that the limited notice described above is appropriate, as is leave from the Scheduling Order.

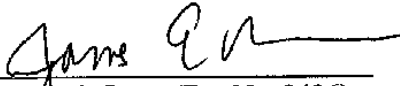
WHEREFORE, the Debtors respectfully request the entry of an Order (i) granting the Debtors leave from the Scheduling Order, (ii) shortening the notice period with respect to the Seal Motion, and (iii) and setting the objection deadline to the Seal Motion at November 30, 2006 at 12:00 p.m., as set forth above.

Dated: November 22, 2006

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Co-Counsel for the Debtors and
Debtors in Possession

The Seal Motion is hereby scheduled to be heard at the Debtors' December 5, 2006 hearing.

**Any objections to the Seal Motion must be filed and served
so as to be received by November 30, 2006 at 12:00 p.m.**

SO ORDERED this ____ day
of November 2006

The Honorable Judith K. Fitzgerald
United States Bankruptcy Judge